

**CHRISTENSEN JAMES & MARTIN**

EVAN L. JAMES, ESQ. (7760)

DARYL E. MARTIN, ESQ. (6735)

7440 W. Sahara Avenue

Las Vegas, Nevada 89117

Telephone: (702) 255-1718

Facsimile: (702) 255-0871

Email: [elj@cjmlv.com](mailto:elj@cjmlv.com), [dem@cjmlv.com](mailto:dem@cjmlv.com)

*Attorneys for Defendants Nevada Service Employees*

*Union, Luisa Blue, and Martin Manteca*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JAVIER CABRERA, et al.

Plaintiffs,

vs.

SERVICE EMPLOYEES  
INTERNATIONAL UNION, et al.,

Defendants.

Case No.: 2:18-cv-00304-RFB-DJA

**STIPULATION TO EXTEND  
DEADLINE TO RESPOND  
TO MOTIONS IN LIMINE AND  
MOTION TO BIFURCATE TRIAL  
(FIRST REQUEST)**

Pursuant to LR IA 6-1, Plaintiff Debbie Miller and Defendants Service Employees International Union (“SEIU”) and Clark County Public Employees Association dba Nevada Service Employees Union (“Local 1107”) (collectively the “Parties”), acting through their respective counsel of record, respectfully submit this Stipulation to Extend Deadline to Respond to the Parties’ Motions in Limine (ECF Nos. 267, 268, 270, 271, 272, 273, 274, 275) and Defendants’ Motion to Bifurcate Trial (ECF 269), all of which were filed on September 1, 2023. This is the first request for an extension of time to respond to these motions.

Given the number and nature of the issues presented in the aforementioned motions, counsel for the Parties have agreed to jointly request the Court’s Order

1 extending the response deadline by two weeks, from September 15 to September 29,  
 2 2023. This extension is being requested in good faith and will not delay further  
 3 proceedings in this Case.

4  
 5 CHRISTENSEN JAMES & MARTIN

ROTHNER, SEGALL & GREENSTONE

6 By: /s/ Daryl E. Martin

By: /s/ Eli Naduris-Weissman

7 Daryl E. Martin, Esq.

Eli Naduris-Weissman, Esq.

8 Nevada Bar No. 6735

Pro Hac Vice

9 7440 W. Sahara Avenue

510 S. Marengo Ave.

10 Las Vegas, NV 89117

Pasadena, California 91101-3115

11 Tel.: (702) 255-1718

Tel.: (626) 796-7555

12 Fax: (702) 255-0871

enaduris-weissman@rsglabor.com

13 dem@cjmlv.com

*Attorneys for Defendants SEIU and*

14 *Attorneys for Defendants Local*

*Mary Kay Henry*

15 *1107, Luisa Blue, and*

16 *Martin Manteca*

17 By: /s/ Michael J. Mcavoyamaya

18 Michael J. Mcavoyamaya, Esq.

19 Nevada Bar No. 14082

20 4539 Paseo Del Ray

21 Las Vegas, NV 89121

22 Tel.: (702) 299-5083

23 mike@mrlawlv.com

24 *Attorney for Plaintiff Debbie Miller*

25 ORDER

26 Good cause appearing, the Court grants the foregoing Stipulation to Extend  
 27 Deadline to Respond to the Motions in Limine and Motion to Bifurcate Trial filed  
 by the Parties on September 1, 2023. Responses shall be filed on or before September  
 29, 2023.



United States District Court Judge

Dated: September 11, 2023